



OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

KWAME RAOUL
ATTORNEY GENERAL

September 16, 2019

The Honorable Scott S. Harris
Clerk of the Court
Supreme Court of the United States
One First Street, N.E.
Washington, D.C. 20543

Re: *Michael N. Thomas v. Raymond Anderson, et al.*
No. 18-1424

Dear Mr. Harris:

Pursuant to Supreme Court Rule 30.4, Respondents Raymond Anderson, Richard W. Cochran, Cornealious Sanders, Scott A. Bailey, and Roger Fitchpatrick respectfully request a 14-day extension to October 14, 2019, to file its response to the petition for certiorari in the above-captioned case. On July 31, 2019, the Court directed Respondents to file a response to the petition by August 30, 2019. The Court then granted Respondents' request for an extension of time to September 30, 2019. I have contacted counsel for Petitioner, who indicates that he has no objection to this request for a 14-day extension of time.

This extension is necessary due to current and recent work responsibilities and so that I can draft a thorough response that is helpful to the Court. Because I did not handle the underlying appellate proceedings—the attorney who briefed and argued the case has since left the Illinois Attorney General's Office—this response has required more time than usual to prepare. In addition, I filed a response brief in *Reed v. Illinois*, No. 19-1164 (7th Cir.), on August 28, 2019, on three extensions of time, and participated in oral argument in *Proft v. Raoul*, No. 18-3475 (7th Cir.), on September 6, 2019. Also, as a supervising attorney, I devote substantial time to performing numerous supervisory and administrative duties, such as reviewing briefs in *Moore v. Godinez*, No. 4-18-0573 (Ill. App. Ct.), *Owens v. Duncan*, No. 18-1416 (7th Cir.), and *Boykin v. Sandholm*, No. 18-1154 (7th Cir.); reviewing jurisdictional issues in multiple appeals, including *Hoskins v. Mezo*, No. 18-3024 (7th Cir.), *Turley v. Lawrence*, No. 19-2489, and *Mayle v. Illinois*, No. 19-1691 (7th Cir.); assisting oral argument preparations in *Hildreth v. Butler*, No. 18-2660 (7th Cir.), *Aperion Care, Inc. v. Eagleson*, No. 18-3076 (7th Cir.), *Janus v. AFSCME*, No. 19-1553 (7th Cir.),



OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

KWAME RAOUL
ATTORNEY GENERAL

and *Western Illinois Service Coordination v. Illinois Department of Human Services*, No. 19-2211 (7th Cir.); and helping prepare for mediations ordered pursuant to 7th Cir. R. 33, such as in *Johnson v. Newton*, No. 19-2261 (7th Cir.).

This is Respondents' second request for an extension of time. It is not made for purposes of delay, but so that I may meet my professional responsibilities, properly represent my clients, and provide this Court with a thorough brief in this matter.

Very truly yours,

/s/ Frank H. Bieszczat
Assistant Attorney General
Office of the Illinois Attorney General
100 West Randolph Street, 12th Floor
Chicago, Illinois 60601
(312) 814-2234
fbieszczat@atg.state.il.us

cc: Clifford W. Berlow, Counsel for Petitioner